

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to All Actions

DECLARATION OF GENEVIEVE M. ZIMMERMAN

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbeshier & Spence Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. Attached hereto as Exhibit 1 is a true and correct copy of portions of Jim Ho's deposition, taken in Calgary, Canada, on June 28, 2017.
3. Attached hereto as Exhibit 2 is a true and correct copy of portions of Jim Ho's Expert Report.
4. Attached hereto as Exhibit 3 is a true and correct copy of Stocks, G., *Predicting bacterial populations based on airborne particulates: A study performed in nonlaminar flow operating rooms during joint arthroplasty surgery*, AM. J. INFECTION CONTROL (2010) (also bearing 3MBH00134090-5).
5. Attached hereto as Exhibit 4 is a true and correct copy of a, internal 3M document bearing 3MBH00050770.
6. Attached hereto as Exhibit 5 is a true and correct copy of Darouiche, R., *Airborne Microorganisms in the Operating Room with Implant Infections: A Randomized Controlled Trial*, INFECTION CONTROL & HOSPITAL EPIDEMIOLOGY (2017).

7. Attached hereto as Exhibit 6 is a true and correct copy of Raval, et.al., *Real-time monitoring of non-viable airborne particles correlates with airborne colonies and represents an acceptable surrogate for daily assessment of cell-processing cleanroom performance*, CYTOTHERAPY (2012).
8. Attached hereto as Exhibit 7 is a true and correct copy of portion of *Concentrations and Size Distributions of Airborne Particulate Matter and Bacteria in an Experimental Aviary Laying-Hen Chamber*, JOURNAL OF THE AMERICAN SOCIETY OF AGRICULTURAL AND BIOLOGICAL ENGINEERS (2013).

Dated: September 12, 2017

/s/ Genevieve M. Zimmerman

Genevieve M. Zimmerman (MN#330292)
MESHBESHER & SPENCE, LTD.
1616 Park Avenue
Minneapolis, MN 55404
Phone: (612) 339-9121
Fax: (612) 339-9188
Email: gzimmerman@meshbesh.com

Plaintiffs Co-Lead Counsel